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Attorneys for Plaintiffs,  
 Christopher Clark and James Renick

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

CHRISTOPHER CLARK and JAMES	)	Case No. 08-CV-0500 JM RBB
RENCIK	)	(San Diego County Superior Court
	)	Case No. 37-2007-00883776-CU-OE-CTL)
Plaintiffs,	)	
	)	STIPULATED EX PARTE APPLICATION FOR
vs.	)	ORDER CONTINUING EARLY NEUTRAL
	)	EVALUATION CONFERENCE; [PROPOSED]
CHASE HOME FINANCE, LLC; a	)	ORDER
Delaware Corporation doing business in	)	
California; CHASE MANHATTAN	)	
MORTGAGE CORPORATION, a New	)	
Jersey Corporation doing business in	)	
California; JAMES BOUDREAU, an	)	
individual; and DOES 1-25,	)	
	)	
Defendant(s).	)	

**TO DEFENDANTS CHASE HOME FINANCE LLC, CHASE**  
**MANHATTAN MORTGAGE CORPORATION, JAMES BOUDREAU AND**  
**TO THEIR ATTORNEYS OF RECORD:**

Pursuant to Local Rule 7.1 and the Notice and Order for Early Neutral Evaluation, the parties jointly request that the Early Neutral Evaluation Conference be continued to a date subsequent to the hearing on Plaintiff's Motion to Remand and Defendant's Motion on the Pleadings or, in the

1 alternative, for Partial Summary Judgment, presently set for hearing on May 16, 2008, and May  
2 30, 2008, respectively.

3  
4 The current date for the Early Neutral Evaluation (ENE) is April 30, 2008. Extraordinary  
5 circumstances as set for above make a continuance of the ENE appropriate. While the parties are  
6 certainly fully willing to participate in an effort to resolve this dispute, the current date for the ENE  
7 seems to be premature for the reasons set forth above.

8  
9 This case is at the very early stages. Defendants signed a Notice of Acknowledgment of  
10 Receipt of Plaintiff's First Amended Complainant on March 14, 2008. Defendants filed a Notice  
11 of Removal on March 18, 2008 and Plaintiffs filed a Motion to Remand on April 21, 2008. Finally,  
12 on April 25, 2008, Defendants filed their Motion for Judgment on the Pleadings or in the alternative  
13 for Partial Summary Judgment.

14  
15 Given the pending motions now set before this Court in this matter, it is clear that without  
16 a continuance of the ENE, the parties will be participating without a clear understanding which, if  
17 any, of the claims will remain in federal court. Based upon the foregoing, the parties will not be  
18 able to effectively evaluate their respective positions and a continuance of the ENE by this Court  
19 is appropriate.

20  
21 For the foregoing reasons, it is respectfully submitted that it is appropriate for this Court to  
22 continue the ENE currently set for April 30, 2008, at 8:30 a.m.

DATED: April 29, 2008

Respectfully submitted,

UNITED EMPLOYEES LAW GROUP, PC

By: Gregory A. Douglas  
Gregory A. Douglas

Gregory A. Douglas  
Attorneys for Plaintiffs  
CHRISTOPHER CLARK and  
JAMES RENICK

DATED: April 29, 2008

ORRICK, HERRINGTON &amp; SUTCLIFFE

By: Erin Connell

Erin M. Connell  
Attorneys for Defendants  
CHASE HOME FINANCE, CHASE  
MANHATTAN MORTGAGE and  
JAMES BOUDREAU

The Court having considered the Ex Parte Application of Plaintiff, and good cause appearing therefore, the Early Neutral Evaluation Conference is presently set for April 30, 2008, is vacated. This Court will set a mutually convenient date and time for the ENE.

**IT IS SO ORDERED.**

Dated: April \_\_, 2008

Ruben B. Brooks  
United States Magistrate Judge